## **BELLSOUTH**

**BellSouth Telecommunications, Inc.** 333 Commerce Street, Suite 2101 Nashville, TN 37201-3300

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Guy M. Hicks RECULAT General Counsel

May 16, 2002 '02 MAY 16

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EXECUTIVE SECRETARY

VIA HAND DELIVERY

David Waddell, Executive Secretary Tennessee Regulatory Authority 460 James Robertson Parkway Nashville, TN 37238

Re:

Generic Docket to Consider Technology Advances

Docket No. 02-00434

Dear Mr. Waddell:

Enclosed are the original and thirteen copies of BellSouth's Petition for Leave to Intervene. Copies of the enclosed are being provided to counsel of record.

Very truly yours,

Guy M. Hicks

GMH:ch



BEFORE THE TENNESSEE REGULATORY AUTHORITY NASHVILLE, TENNESSEE

IN RE:

Generic Docket to Consider Technology Advances

Docket No. 02-00434

PETITION OF BELLSOUTH TELECOMMUNICATIONS, INC. FOR LEAVE TO INTERVENE

BellSouth Telecommunications, Inc., pursuant to T.C.A. §4-5-310 and T.C.A. §65-2-107, petitions the Tennessee Regulatory Authority (the "Authority") for leave to intervene in the above-captioned proceeding, and in support thereof states as follows:

- 1. Petitioner, a Georgia Corporation authorized to conduct and conducting a public utility business in the state of Tennessee, is engaged in furnishing exchange telephone service and intrastate (long distance) intraLATA telephone service in the state of Tennessee subject to the jurisdiction of the Authority and pursuant to T.C.A. §65-4-101 and T.C.A. §65-5-201, et seq.
- 2. The Authority recently convened this proceeding to establish rates for those BellSouth Unbundled Network Elements on which technology advances have had an impact.
- 3. Petitioner's legal interests may be determined in the proceedings and Petitioner's interests will not be adequately represented unless the Authority allows the Petitioner to intervene.

- 4. Allowing Petitioner to intervene will not impair the interests of justice or the orderly and prompt conduct of these proceedings.
- 5. Petitioner respectfully requests that it be granted leave to intervene and participate as a party in the above-captioned proceeding.

WHEREFORE, Petitioner prays:

- 1. That it be permitted to intervene in this proceeding and participate as a party.
- 2. That Petitioner have such other and further relief to which it may be entitled.

Respectfully submitted,

BELLSOUTH TELECOMMUNICATIONS, INC.

Guy M. Hicks 333 Commerce Street, Suite 2101 Nashville, Tennessee 37201-3300 (615) 214-6301

## CERTIFICATE OF SERVICE

I hereby certify that on May 16, 2002, a copy of the foregoing document was served on the parties of record, via the method indicated:

[ ]	Hand
-1/-	∟ Mail
[ ]	Facsimile
[ ]	Overnight
[ ]	Hand
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Γ 1	Overnight

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